

partners. As described in detail below in Section II.G.8.c., Goff was referred to Eckstein on the basis of Eckstein's close friendship with Secretary Babbitt. Eckstein was a highly regarded attorney in Phoenix who had previously represented clients in matters before Interior, but who had not lobbied Babbitt during the Secretary's tenure in Washington. Despite initial reluctance, Eckstein agreed to get involved for the applicant group, at least to the extent of seeking answers for them as to where the application stood in the aftermath of the additional comment period.

On April 6, Eckstein contacted Secretary Babbitt by phone and announced his entry into the Hudson matter for the applicant group. Eckstein testified that he also sought and obtained Babbitt's agreement that no decision would be made on the application until the applicant tribal leaders had received an opportunity to make their case directly to the Secretary. Babbitt cannot now recall the conversation, but believes he agreed only that the applicants could meet with the decision-makers, as opposed to Babbitt himself.

Sometime in March or April, Fred Havenick contacted his friend Jerome Berlin for a recommendation of a well-connected Democratic lobbyist in Washington. Berlin was himself a prominent Democratic supporter and DNC trustee, with close ties to the Administration. Berlin's suggestion was Jim Moody, a former Democratic congressman from Wisconsin, who was then performing lobbying work independently. Havenick and Goff brought Moody into the matter.

The applicant group became concerned about the status of the Hudson application yet again on May 8, when they received a copy of Patrick O'Connor's letter to Harold Ickes. Records show that by May 9, Havenick, Goff, Eckstein and Moody were conferring about what more the applicants could do to promote the application at Interior. Moody contacted Duffy by